

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: **16-23974**
Judge: **Beth E. Hanan**
Chapter: **Chapter 13**

In Re: Lamar Terrell Hall

NOTICE OF MOTION TO ABANDON PROPERTY OF THE ESTATE

To all creditors and parties in interest:

The Debtor, through Geraci Law, LLC, has filed a Motion to Abandon Property of the Estate. A copy of that motion accompanies this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant Debtor(s)' motion, or if you want the court to consider your views on the motion, **then on or before 14 days from the date of this Notice, you or your attorney must file an object with:**

1. Clerk, U.S. Bankruptcy Court
517 East Wisconsin Avenue
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Law Offices of Peter Francis Geraci
Andrew Mark Golanowski
2505 N. Mayfair Rd. #101
Wauwatosa, WI 53226

Lamar Terrell Hall
3841 N. 58th Blvd.
Milwaukee, WI 53216

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: Friday, May 27, 2016

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney of the Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
Email: wal@geracilaw.com

Rec. No: 707284
WD - MOT - Motion to Incur Additional Debt

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: **16-23974**
Judge: **Beth E. Hanan**
Chapter: **Chapter 13**

In Re: Lamar Terrell Hall

MOTION TO ABANDON PROPERTY OF THE ESTATE

NOW COMES the Debtor, Mr. Lamar Hall (the “Debtor”), by and through his attorneys, Geraci Law, LLC, to present his Motion to Abandon Property of the Estate, and states as follows:

1. Debtor is co-owner of real estate at 5086 Radcliffe Drive, Milwaukee, Wisconsin 53223.
2. Debtor has an offer to purchase that property at a short sale, with consent of the lender, Seaway Bank and Trust Company (“Seaway”) for \$158,000.
3. Debtor owes \$167,811 to Seaway, which has a mortgage on the property.
4. The total value of the property is \$188,000, according to the property tax bill. Debtor has a one-half interest in the property.
5. This is the best offer the Debtor has received on the property, which has been on the market for at least 6 months.
6. Debtor needs the Estate to abandon the property in order to proceed with the sale.

WHEREFORE, the Debtor, Mr. Lamar Hall, pray this Court enter an order:

- 1) Approving this Motion to Abandon Property of the Estate.

- 2) Any other relief that this court deems just and proper.

Respectfully submitted and dated this Friday, May 27, 2016.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney for Debtor
Bar #: 1055499

Rec. No: 707284
WD - MOT - Motion to Incur Additional Debt

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: **16-23974**
Judge: **Beth E. Hanan**
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CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Motion were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Friday, May 27, 2016:

Lamar Hall
3841 N. 58th Blvd. 1
Milwaukee, WI 53216

SEE ATTACHED LIST

Additionally, the documents referenced above were also served via electronic means on the following individuals on Friday, May 06, 2016:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Friday, May 27, 2016.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney of the Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
[Email: wat@geracilaw.com](mailto:wat@geracilaw.com)

Rec. No: 707284
WD - MOT - Motion to Incur Additional Debt

Label Matrix for local noticing
0757-2
Case 16-23974-beh
Eastern District of Wisconsin
Milwaukee
Fri May 27 15:02:43 CDT 2016

BMO Harris
Bankruptcy Dept.
3536 W Fond du Lac Ave
Milwaukee,WI 53216-3737

Alliance Collection AG
Attn: Bankruptcy Dept.
3916 S Business Park Ave
Marshfield,WI 54449-9029

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Children's Hospital of Wisconsin
Bankruptcy Dept.
9000 W. Wisconsin Ave.
Milwaukee,WI 53226-4874

(p)EDUCATORS CREDIT UNION
1326 WILLOW RD
MOUNT PLEASANT WI 53177-1917

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta,GA 30374-0241

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen,TX 75013-2002

Froedtert Hospital
Bankruptcy Dept.
PO Box 9030
Menomonee Falls,WI 53052-9030

Heller Law Offices LLC
1633 N. Prospect Ave, Ste 4C
Milwaukee,WI 53202-2477

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia,PA 19101-7346

Medical College of Wisconsin
Bankruptcy Dept.
PO Box 13308
Milwaukee,WI 53213-0308

Milwaukee County Child Support
Attn. Attorney John Pintar
901 N. 9th Street, Room 101
Milwaukee,WI 53233-1425

Milwaukee County Child support
Bankruptcy Dept.
901 N. 9th Street, Room 101
Milwaukee,WI 53233-1425

Milwaukee County Circuit Court
2016SC009199
901 N. 9th ST.
Milwaukee,WI 53233-1425

Monique Junior
1015 N Carrier Pkwy, C257
Grand Prairie,TX 75050-0817

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Optimum Outcomes INC
Attn: Bankruptcy Dept.
2651 Warrenville Rd Ste
Downers Grove,IL 60515-5544

Roundy S Supermarkets INC.
C/O THE Affiliated Group I
Po Box 7739
Rochester,MN 55903-7739

Seaway BANK & Trust CO
Attn: Bankruptcy Dept.
645 E 87Th St
Chicago,IL 60619-6183

The Law Office of Hazel J Washington SC
2828 N 60th St.
Milwaukee,WI 53210-2103

Transunion
Attn: Bankruptcy Dept.
PO Box 1000
Chester,PA 19022-1023

WI SCTF
Bankruptcy Department
PO Box 07914
Milwaukee,WI 53207-0914

WI SCTF
Milwaukee County Child Support Services
901 N 9th St., Rm. 101
Milwaukee, WI 53233-1425

Wisconsin Dept. of Revenue
Special Procedures Unit
PO Box 8901
Madison,WI 53708-8901

Alexander E. George
Geraci Law L.L.C.
55 E. Monroe #3400
Chicago, IL 60603-5920

Andrew M. Golanowski
Geraci Law, L.L.C.
55 E. Monroe St. Suite #3400
Chicago, IL 60603-5920

Lamar Terrell Hall
3841 N. 58th Blvd.
APT# 1
Milwaukee, WI 53216-2228

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203-0161